

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ENHANCED SECURITY RESEARCH, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
CISCO SYSTEMS, INC.;	)	
INTERNATIONAL BUSINESS MACHINES	)	C.A. No. 09-390-JJF
CORPORATION;	)	
CHECK POINT SOFTWARE	)	
TECHNOLOGIES, LTD.;	)	
CHECK POINT SOFTWARE	)	
TECHNOLOGIES, INC.;	)	
SONICWALL, INC.;	)	
3COM CORPORATION;	)	
NOKIA CORPORATION; NOKIA, INC.;	)	
FORTINET, INC.; and SOURCEFIRE, INC.,	)	
	)	
Defendants.	)	

ENHANCED SECURITY RESEARCH, LLC	)	
and SECURITY RESEARCH HOLDINGS LLC,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
CISCO SYSTEMS, INC.;	)	
INTERNATIONAL BUSINESS MACHINES	)	C.A. No. 09-571-JJF
CORPORATION;	)	
CHECK POINT SOFTWARE	)	
TECHNOLOGIES, LTD.;	)	
CHECK POINT SOFTWARE	)	
TECHNOLOGIES, INC.;	)	
SONICWALL, INC.;	)	
3COM CORPORATION;	)	
NOKIA CORPORATION; NOKIA, INC.;	)	
FORTINET, INC.; and SOURCEFIRE, INC.,	)	
	)	
Defendants.	)	

**STIPULATION AND ORDER AMENDING SCHEDULING ORDER**

By stipulation and agreement of the parties, and with the express consent of counsel for plaintiffs and counsel for defendants, as indicated below, and for good cause shown; and

It appearing that paragraph 2 of the Rule 16 Scheduling Order entered by the Court on January 14, 2010 (the "Scheduling Order") provides that all motions to join other parties shall be filed on or before May 31, 2010; and

It further appearing that paragraph 4(a) of the Scheduling Order provides that the parties shall identify fact witnesses and complete document production by April 30, 2010; and

It further appearing that that parties have conferred regarding these deadlines, and believe that these deadlines should be extended as follows:

1. All motions to join other parties shall be filed on or before July 1, 2010;
2. The parties shall identify fact witnesses and complete document production by June 1, 2010.

NOW, THEREFORE, IT IS HEREBY ORDERED that the Scheduling Order entered in these actions be, and hereby is, modified as follows:

1. All motions to join other parties shall be filed on or before July 1, 2010;
2. The parties shall identify fact witnesses and complete document production by June 1, 2010; and
3. All other provisions of the Scheduling Order shall remain in effect, except as provided for herein.

IT IS SO ORDERED, this 5 day of May, 2010.

  
The Honorable Joseph J. Farnan, Jr.

CONSENTED TO:

**For Plaintiffs**  
**ENHANCED SECURITY RESEARCH**  
**LLC and**  
**SECURITY RESEARCH HOLDINGS,**  
**LLC:**

/s/ John G. Day

Steven J. Balick  
John G. Day  
Tiffany Geyer Lydon  
Caroline Hong  
ASHBY & GEDDES  
500 Delaware Ave., 8th Floor  
Wilmington, DE 19801  
[sbalick@ashby-geddes.com](mailto:sbalick@ashby-geddes.com)  
[jday@ashby-geddes.com](mailto:jday@ashby-geddes.com)  
[tlydon@ashby-geddes.com](mailto:tlydon@ashby-geddes.com)  
[chong@ashby-geddes.com](mailto:chong@ashby-geddes.com)

Martin R. Lueck  
Sara A. Poulos  
Cole M. Fauver  
Julia Dayton Klein  
Loren L. Hansen  
ROBINS KAPLAN MILLER &  
CIRESI LLP  
800 LaSalle Avenue, Suite 2800  
Minneapolis, MN 55402

**For Defendants**  
**CISCO SYSTEMS, INC. and**  
**3COM CORPORATION:**

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (#1014)  
Rodger D. Smith II (#3778)  
MORRIS, NICHOLS, ARSHT &  
TUNNELL LLP  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899-1347  
(302) 658-9200  
[jblumenfeld@mnat.com](mailto:jblumenfeld@mnat.com)  
[rsmith@mnat.com](mailto:rsmith@mnat.com)

Henry B. Gutman  
Noah Leibowitz  
Victor Cole  
SIMPSON THACHER & BARTLETT  
425 Lexington Avenue  
New York, NY 10017

Jeffrey E. Ostrow  
SIMPSON THACHER & BARTLETT  
2550 Hanover Street  
Palo Alto, CA 94304

**For Defendant  
INTERNATIONAL BUSINESS MACHINES  
CORPORATION:**

/s/ David E. Moore

Richard L. Horwitz

David E. Moore

POTTER ANDERSON & CORROON LLP

1313 N. Market Street, 6th Floor

Wilmington, DE 19801

[rhorwitz@potteranderson.com](mailto:rhorwitz@potteranderson.com)

[dmoore@potteranderson.com](mailto:dmoore@potteranderson.com)

Holmes J. Hawkins III

Natasha H. Moffitt

Charles A. Pannell, III

KING & SPALDING LLP

1180 Peachtree Street, NE

Atlanta, GA 30309

**For Defendants  
NOKIA INC. AND NOKIA  
CORPORATION:**

/s/ Jeffrey L. Moyer

Jeffrey L. Moyer

Sarah R. Stafford

RICHARDS, LAYTON & FINGER

920 North King Street

Wilmington, DE 19801

[moyer@rlf.com](mailto:moyer@rlf.com)

[stafford@rlf.com](mailto:stafford@rlf.com)

**For Defendant  
SOURCEFIRE, INC.:**

/s/ Mary B. Graham

Mary B. Graham  
MORRIS, NICHOLS, ARSHT &  
TUNNELL LLP  
1201 North Market Street  
Wilmington, DE 19801  
[jbbefiling@mnat.com](mailto:jbbefiling@mnat.com)

Alexander J. Hadjis  
Peter J. Davis  
MORRISON & FOERSTER LLP  
2000 Pennsylvania Avenue, NW  
Suite 6000  
Washington, DC 20006

**For Defendant  
SONICWALL, INC.:**

/s/ George Pazuniak

George Pazuniak  
James M. Lennon  
Anna Martina Tyreus  
WOMBLE CARLYLE SANDRIDGE &  
RICE PLLC  
222 Delaware Avenue, Suite 1501  
Wilmington, DE 19801  
[gpazuniak@wcsr.com](mailto:gpazuniak@wcsr.com)  
[JLennon@wcsr.com](mailto:JLennon@wcsr.com)  
[MTyreus@wcsr.com](mailto:MTyreus@wcsr.com)

Kenneth B. Wilson  
Christine S. Watson  
Colby B. Springer  
CARR & FERRELL, LLP  
2200 Geng Road  
Palo Alto, CA 94303

**For Defendant  
FORTINET, INC.:**

/s/ James L. Higgins

Richard H. Morse

James L. Higgins

YOUNG, CONAWAY, STARGATT &  
TAYLOR LLP

The Brandywine Building

1000 West Street, 17th Floor

Wilmington, DE 19801

[rmorse@ycst.com](mailto:rmorse@ycst.com)

[jhiggins@ycst.com](mailto:jhiggins@ycst.com)

Stefani E. Shanberg

Robin L. Brewer

WILSON SONSINI GOODRICH & ROSATI

650 Page Mill Road

Palo Alto, CA 94304

**For Defendants  
CHECK POINT SOFTWARE  
TECHNOLOGIES LTD. and  
CHECK POINT SOFTWARE  
TECHNOLOGIES INC.:**

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (#1014)

Rodger D. Smith II (#3778)

MORRIS, NICHOLS, ARSHT &  
TUNNELL LLP

1201 North Market Street

P.O. Box 1347

Wilmington, DE 19899-1347

(302) 658-9200

[jblumenfeld@mnat.com](mailto:jblumenfeld@mnat.com)

[rsmith@mnat.com](mailto:rsmith@mnat.com)

Edward J. DeFranco

QUINN EMANUEL URQUHART OLIVER  
& HEDGES, LLP

51 Madison Avenue

New York, NY 10010